

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:14-CR-240-BR

UNITED STATES OF AMERICA	)	
	)	
v.	)	GOVERNMENT'S PROPOSED
	)	VOIR DIRE
WILLIAM SCOTT DAVIS, JR.	)	
_____	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, pursuant to 24(a) of the Federal Rules of Criminal Procedure and Local Criminal Rules 24.1 and 24.2(b), respectfully requests that the Court include the following in its examination of prospective jurors the customary questions listed below:

1. Occupation and address (city/county).
2. Education.
3. Marital status and number/age of children.
4. Spouse's occupation, if applicable.
5. Church affiliation.
6. To what organizations do you belong?
7. Juror's knowledge of the case in which they may sit as jurors.

8. Relationship to or acquaintance with the defendant, his attorney, the attorneys for the Government, and prospective witnesses for either party.

In addition to these customary questions, the United States also respectfully requests that the following additional questions be asked:

1. Has any juror, relative or close friend of any juror, ever been the subject of an investigation or a prosecution, audit or administrative action by any agency of the United States Government, the United States Attorney's Office, the Federal Bureau of Investigation, Raleigh Police Department, Cary Police Department, or any other federal, state or local law enforcement agency? If so, do you feel that person was treated fairly in the criminal justice system?

2. Has any juror, relative or close friend of any juror, ever been charged with or convicted of stalking or any other domestic violence-related offense in either state or federal court? If so, what was the nature of the charge, what was the county of conviction, and what was the year of conviction? Do you feel that person was treated fairly in the criminal justice system?

3. Has any juror, relative or close friend of any juror, ever been arrested, charged, or convicted of any other offense in either state or federal court? If so, what was the nature of the charge, what was the county of conviction, and what was the year

of conviction? Do you feel that person was treated fairly in the criminal justice system?

4. Has any juror, relative or close friend of any juror, ever testified in a court proceeding before? If so, what was the nature of the proceeding and where did the proceeding take place? Was there anything about the proceeding that would affect your ability to be fair and impartial in this case?

5. Has any juror, relative or close friend of any juror, ever been the victim of stalking or other domestic violence? Was there anything about this matter that would affect your ability to be fair and impartial in this case?

6. Has any juror, relative or close friend of any juror, ever applied for, obtained, or been the subject of a domestic violence protective order or a "no contact" order? If so, what was the nature of the matter and where did it take place? Was there anything about the matter that would affect your ability to be fair and impartial in this case?

7. Has any juror, relative or close friend of any juror, been named in court proceedings involving child custody disputes, including, but not limited to, divorce, adoption, or the determination of parental rights? If so, what was the nature of the proceeding and where did the proceeding take place? Was there anything about the proceeding that would affect your ability to be fair and impartial in this case?

8. Has any juror ever come to court as a support person for a victim or a defendant in a criminal case? If so, please describe the circumstances. Do you think the person you supported was treated fairly in the criminal justice system?

9. Has any juror ever come to state or federal court for any other reason not previously disclosed?

10. Has any juror, relative or close friend of any juror, ever had any negative experience with law enforcement? If so, what was the nature of the negative experience? Would you be able to put that experience aside and be fair and impartial to both sides in this case?

11. Has any juror, relative or close friend of any juror, ever been a victim of crime? If so, what happened to you? Was the perpetrator arrested? If so, do you believe the person was treated fairly in the court process as a victim?

12. Has any juror, relative or close friend of any juror, ever worked, in any capacity, as a defense attorney, with or for a defense attorney, or as an investigator working for a defense attorney?

13. Has anyone had any legal training or have a relative or close friend who is either a member of the judiciary or a practicing attorney, paralegal or law student?

14. Without inquiring into any juror's particular religious beliefs, does any juror have a religious belief or moral philosophy

that would prevent him or her from sitting in judgment of another, or rendering a verdict in this case, either guilty or not guilty, based on the evidence and the Court's instructions on the law?

15. Has any member of the jury panel, as it is now composed, ever served as a juror before, either in state or federal court? Were you the foreperson? Did that jury reach a verdict? Was this a civil or criminal case? If criminal, what was the charge?

16. Does any member of the jury panel know any other potential jurors either in the jury box or in the courtroom? If so, how do you know that potential juror? Would your knowledge of the potential juror affect your ability to be fair and impartial to both sides in this case?

17. Is any juror riding with anyone who will be sitting in the courtroom during the trial?

18. Does each juror agree and promise to follow the law as you are instructed by this Court even if you may disagree with the law or believe that the law should be changed?

19. One or more law enforcement officers will testify in this case. Is there anyone who believes that their testimony is entitled to more or less belief than any other witness merely because he or she works for the Government and carries a badge?

20. Your duty as jurors is to judge guilt or innocence based on the evidence. It is my duty as judge to determine punishment if the defendant is found guilty. The law does not permit you to

consider the issue of punishment because there are factors having nothing to do with this trial that will determine lenience or harshness. Is there anyone here who would consider punishment in his or her deliberations on the verdict?

21. Does any juror have hearing or vision problems that would make it difficult for you to serve as a member of this jury panel?

22. Is there any other reason not previously discussed why any juror would be unable to give this case his or her full attention?

23. Is there any juror who could not be fair and impartial to both sides?

Respectfully submitted this \_\_\_\_ day of December, 2017.

ROBERT J. HIGDON, JR.  
United States Attorney

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CERTIFICATE OF SERVICE

This is to certify that I have this 5<sup>th</sup> day of December, 2017, served a true and correct copy of the foregoing upon the defendant in this action by depositing a copy of the same in the United States mail in a postpaid envelope addressed as follows:

William Scott Davis #101473  
Piedmont Regional Jail  
801 Industrial Drive  
Farmville, VA 23901

/s/ Adam F. Hulbig  
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